

WILENTZ, GOLDMAN & SPITZER P.A.
Donna M. Jennings, Esq. (DJ7790)
Risa M. Chalfin, Esq. (RC3832)
90 Woodbridge Center Drive
Post Office Box 10
Woodbridge, New Jersey 07095
(732) 636-8000
Attorneys for Plaintiff WR Property, LLC

-and-

STORZER AND ASSOCIATES, P.C.
Roman Storzer, Esq., admitted pro hac vice
Sieglinde Rath, Esq.
1025 Connecticut Avenue NW, Suite 1000
Washington, D.C. 20036
(202) 857-9766
Attorneys for Plaintiffs Agudath Israel of America and WR Property, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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AGUDATH ISRAEL OF	:	
AMERICA and WR PROPERTY	:	Civil Action No. 3:17-cv-03226-
LLC,	:	MAS-DEA
	:	
Plaintiffs,	:	
	:	
v.	:	NOTICE OF MOTION TO
	:	ENJOIN DEFENDANT THE
	:	TOWNSHIP OF JACKSON
TOWNSHIP OF JACKSON, NEW	:	FROM CONTINUING TO
JERSEY	:	SPOLIATE EVIDENCE AND
	:	FOR SANCTIONS
Defendant.	:	
	:	Motion Day: May 6, 2019
	:	
	:	<u>ORAL ARGUMENT REQUESTED</u>
	:	
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PLEASE TAKE NOTICE that on May 6, 2019, the undersigned attorneys for Plaintiffs Agudath Israel of America and WR Property LLC (collectively, “Plaintiffs”) shall move before the Honorable Douglas Arpert, U.S.M.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & United States Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order granting Plaintiffs’ motion to enjoin Defendant the Township of Jackson (“Defendant”) from Continuing to Spoliate Evidence and for Sanctions.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Plaintiffs shall rely upon the enclosed Brief and Declaration of Donna M. Jennings, Esq., which are being filed and served herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument if written opposition to Plaintiffs' motion is timely filed and served, and that a proposed form of Order is submitted herewith.

WILENTZ, GOLDMAN & SPITZER, P.A.
Attorneys for Plaintiff WR Property, LLC

By: /s/Donna M. Jennings
DONNA M. JENNINGS

STORZER AND ASSOCIATES, LLC
Attorneys for Plaintiffs Agudath Israel of America
and WR Property, LLC

By: /s/Sieglinde K. Rath
SIEGLINDE K. RATH
ROMAN P. STORZER, admitted *pro hac vice*

Dated: April 12, 2019